

IN THE UNITED STATES DISTRICT COURT  
 'FOR THE NORTHERN DISTRICT OF OHIO  
 EASTERN DIVISION

Larry Reid, et al.,

Plaintiffs,

- vs -

Darryl Moore,

Defendant.

Case No. 1:21-cv-00991

Judge James Gwin

Fee Estimate of the Plaintiffs

Plaintiffs, by and through undersigned counsel and in accordance with the Case Management Order (ECF No. 11) entered by the Court on July 26, 2021, hereby submit the following Attorney Fee Estimate, in that the Plaintiffs anticipate seeking fees pursuant to the common law and statutes of Ohio should they prevail on their claims.

<b>Attorney Fees</b>		<b>Costs</b>
Preliminary Investigation & Filing	\$10,000.00	Depositions \$ 8,500.00
Procedural Motion Practice	\$9,000.00	Experts \$ 14,000.00
Discovery	\$45,000.00	Witness Fees \$ 1,500.00
Dispositive Motion Practice	\$27,500.00	
Settlement Negotiations	\$3,500.00	
Pretrial Preparation	\$27,500.00	
Trial	\$15,000.00	
<b>Total Fees</b>	<b>\$137,500.00</b>	<b>Total Costs</b> \$ 24,000.00

These represent estimates derived from a detailed worksheet and are based on reasoned assumptions about the number of depositions, at the present hourly and transcription costs, the number of trial witnesses expected over a four days trials, and the use of an expert economist as to damages and one additional expert regarding social media business practices. Of course, success in negotiations or dispositive motion practice would substantially reduce both cost and expense estimates.

Respectfully submitted,

**/s/ Raymond V. Vasvari, Jr.**

Raymond V. Vasvari, Jr. (0055538)  
vasvari @ vasvarilaw.com  
K. Ann Zimmerman (0059486)  
zimmerman @ vasvarilaw.com  
Vasvari & Zimmerman  
20600 Chagrin Boulevard  
Suite 800 Tower East  
Shaker Heights, Ohio 44122-5366  
Telephone | 216.458.5880  
Telecopier | 216.302.3700

Attorneys for Plaintiffs

**- Certificate of Service -**

The foregoing Fee Estimate was filed today, September 2, 2021 through the Court Electronic Filing System. Copies will be provided to counsel of record by, and may be obtained through operation of the CM / ECF System.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

Raymond V. Vasvari, Jr. (0055538)  
Vasvari | Zimmerman

One of the Attorneys for the Plaintiffs